

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

Motion Day: TBD

**NOTICE OF MOTION TO
COMPEL DEPOSITION
TESTIMONY OF PAUL HESS AND
FOR SANCTIONS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that on a date to be determined by the parties and the Court, the undersigned counsel, pursuant to Federal Rules of Civil Procedure 16, 30, and 37 will bring Defendants Johnson & Johnson and LLT Management LLC (“Defendants”)’s Motion to Compel Deposition Testimony of Paul Hess and Appropriate Sanctions:

Defendants request that oral argument be held in connection with this motion.

Dated: July 22, 2024

Respectfully submitted,

/s/ Kristen R. Fournier

Kristen R. Fournier

KING & SPALDING LLP
1185 Avenue of the Americas
34th Floor
New York, NY 10036
(212) 556-2100
kfournier@kslaw.com

Susan M. Sharko
**FAEGRE DRINKER BIDDLE &
REATH LLP**
600 Campus Drive
Florham Park, NJ 07932
susan.sharko@faegredrinker.com

*Attorneys for Defendants Johnson &
Johnson and LLT Management, LLC*